



CALFED
BAY-DELTA
PROGRAM

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file: /

January 10, 1996

Mr. Harlan Glines
Jones and Stokes Associates
2600 V Street
Sacramento, CA 95818

Dear Mr. Glines:

Re: Draft Purpose and Need Discussion Paper

I have reviewed your draft Purpose and Need discussion paper and believe we are heading in the right direction. Before mentioning some adjustments, I would like to note that we are going to use this package to educate the Program Team, CALFED and their staff and BDAC about Purpose and Need statements in general, and to define the CALFED Bay-Delta Program Purpose and Need statement in particular. We will need to prepare overheads of this information for workshop presentations before January 23, 1996.

I would like to see the next draft set up as follows:

1. An Introduction section which explains what is contained in the document and any issues that the reader should comment on or be thinking about.
2. The second section will offer an explanation of what the Purpose and Need is and how it is used. I am envisioning an opening sentence or two such as the following: Early on in an environmental document, NEPA directs us to identify what the alternatives will accomplish and why the alternatives are necessary. This brief declaration is a statement of Purpose and Need. There is no similar requirement to prepare a Purpose and Need statement pursuant to CEQA. This initial statement would be followed by information you have developed such as: a description of Purpose and Need cannot be tied to any alternatives and why; the points taken from "NEPA Law and Litigation"; a discussion of how the Purpose and Need statements are used to identify alternatives with some explanation about how we have identified alternatives in the planning process without the Purpose and Need statement; and how each alternative will be evaluated in terms of how well it meets the stated "Purpose."

CALFED Agencies

California

The Resources Agency
Department of Fish and Game
Department of Water Resources
California Environmental Protection Agency
State Water Resources Control Board

Federal

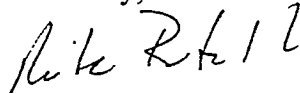
Environmental Protection Agency
Department of the Interior
Fish and Wildlife Service
Bureau of Reclamation
Department of Commerce
National Marine Fisheries Service

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3. The third section will present examples of programmatic and specific Purpose and Need statements. It should: tell the reader what to expect, particularly the differences they should look for between specific and programmatic Purpose and Need statements; provide a short background on each of the programmatic and specific project examples and their respective Purpose and Need statements; and 3) reiterate how the programmatic Purpose and Need statements differ from specific Purpose and Need statements. I suggest we use CVPIA PEIS, Refuge 2003 and one of the Forest Service's Forest Plans as examples of programmatic documents. The choice of documents as examples of specific projects should facilitate our desire to show a difference between the two types of Purpose and Need statements.
4. The last section will contain our proposed Purpose and Need statement. I agree that what is currently written may be too broad. However, we should let the Program Team review the draft Purpose and Need statement before attempting any refinements. I think this question about whether or not it is too broad is perfect for discussion in the first section of this document. You will need to add some information about the CALFED Bay-Delta Program geographic scope (see enclosure) to the Purpose and Need statement.

If you have any questions, please give me a call at 657-2666.

Sincerely,



Rick Breitenbach, Assistant Director
Environmental Compliance

Enclosure